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*Attorneys for Claimant*

*Red Granite Investment Holdings, LLC*

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

UP TO \$28,174,145.52 IN  
HUNTINGTON NATIONAL BANK  
ESCROW ACCOUNT NUMBER '7196;  
et al.,

Defendants.

Case No. 19-cv-1327-DSF (PLAx)

**VERIFIED CLAIM AND STATEMENT  
OF INTEREST OF CLAIMANT RED  
GRANITE INVESTMENT HOLDINGS,  
LLC**

### **VERIFIED CLAIM AND STATEMENT OF INTEREST**

By and through its undersigned counsel, Claimant Red Granite Investment Holdings, LLC files this verified claim and statement of interest for property in the above-captioned defendant property pursuant to Supplemental Rule G of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, as follows:

1. Claimant Red Granite Investment Holdings, LLC is a company organized under the laws of Delaware.

2. Claimant asserts an ownership interest in \$14,087,072.76 of the funds in Huntington National Bank Escrow Account Number '7196 (“Huntington Funds”) more particularly described in Attachment A to the Verified Complaint for Forfeiture *In Rem* filed in this action.

3. The \$14,087,072.76 of the Huntington Funds claimed by Red Granite Investment Holdings, LLC represent Claimant's share in the buyout of its investment interest in a facilities management company headquartered in Newport, Kentucky.

4. Red Granite Investment Holdings, LLC is the owner of the \$14,087,072.76 of the Huntington Funds and has a legally recognizable interest in those funds.

5. Accordingly, Claimant asserts its interest in the defendant property and has standing to contest its forfeiture.

6. Pursuant to Supplemental Rule E(8), made applicable to forfeiture actions by Supplemental Rule G(1), Claimant expressly limits its appearance to asserting and defending its claim.

1 Dated: May 30, 2019

Respectfully Submitted,

2 BOIES SCHILLER FLEXNER LLP  
3 *Attorney for Red Granite Investment*  
4 *Holdings, LLC*

5 By: /s/ Matthew L. Schwartz  
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**VERIFICATION**

I am a duly-appointed manager of Claimant Red Granite Investment Holdings, LLC. I verify under penalty of perjury under the laws of the United States of America that the foregoing Verified Claim and Statement of Interest is true and correct.

EXECUTED ON: May 30, 2019



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Philip Fier  
Manager  
Red Granite Investment Holdings, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing **VERIFIED CLAIM AND STATEMENT OF INTEREST** was sent by Federal Express this 30th day of May, 2019 to:

Barbara Y. Levy  
Trial Attorney  
United States Department of Justice  
1400 New York Ave., NW, 10th Floor  
Washington, D.C. 20005

Dated: May 30, 2019

By: /s/ Matthew L. Schwartz  
Matthew L. Schwartz  
BOIES SCHILLER FLEXNER LLP